

Exhibit N

Estate of Christine N. Garipoli

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
PAUL GARIPOLI**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF PENNSYLVANIA)

: SS.:

COUNTY OF NORTHAMPTON)

PAUL GARIPOLI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2383 Blue Jay Drive, Nazareth, PA 18604.

2. I am currently 52 years old, having been born on October 15, 1969.

3. I am the husband of Christine N. Garipoli, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my wife's estate.

4. On November 20, 2017, my wife died from brain cancer at age 45. Her cancer was deemed by the World Trade Center Health Program to be causally connected to her exposure to the toxins in the air following the September 11, 2001 terrorist attacks.

5. On December 7, 2017, I was issued Letters Testamentary on my wife's estate from the Court of Common Pleas of Northampton County, Pennsylvania.

6. On September 11, 2001, Christine worked at 60 Wall Street for JP Morgan Chase. On that day, she was in her office. I was in my office at 2 World Trade Center on the 65th Floor, and I almost lost my life in the building. I ran to 60 Wall Street, and the security guard let me in before the World Trade Center collapsed. I was able to meet up with Christine, and we waited for hours before we were allowed to leave. It was so scary, lots of debris coming down

around us. It was like a movie, but real. Then we had to walk a long, long way home through the dust.

7. Christine returned to the office right away. I can't remember how long after the attacks it was, but she went back to work at 60 Wall Street pretty quickly. The World Trade Center site was still smoldering when she went back to work.

8. We had financial difficulty, even in the times where we both worked. Christine worked for a big company and so did I. When Christine got sick, she had to scale back to part-time work. After a while she couldn't work at all. I worked full-time with an average salary, and we lived paycheck to paycheck. Sometimes our extended family would support us financially. It was hard when you just wanted to do little things but couldn't afford them. We tried to get by.

9. Christine had a seizure on New Year's Day in 2013. We had gone out to dinner and came home around 9:00 p.m. I heard a "thud," and thought one of my kids had fallen out of bed. I found Christine lying on the floor; she was having a seizure. We rushed her to Saint Luke's Hospital in Bethlehem, PA. She was found to have a brain mass, but the doctor said it was treatable. The next day, she was sitting up in bed, you wouldn't even know anything happened. They started to treat her with radiation on the back of her head. Her mother and I would take her for all her treatments. She put on weight from the steroids and lost her hair from the radiation. She was such a beautiful young woman, but she would pull out clumps of hair in the shower. She was always doing MRI scans. But she beat the astrocytoma with radiation.

10. In August 2017, Christine was diagnosed with glioblastoma after we came home from Disney World. We learned after we got back from the doctor's office what a glioblastoma was and the prognosis. Our whole family was in denial. After she was diagnosed, she was not herself. She started to "fade." They put her in hospice care, and she asked me, "Am I going to die?" She soon underwent chemotherapy, and her whole left side of her body was paralyzed. The tumor was on the right side of her brain, and it was pressing on the part of her brain that controlled the left side of her body. She was in so much pain, you couldn't even touch her. She was crying out from the pain.


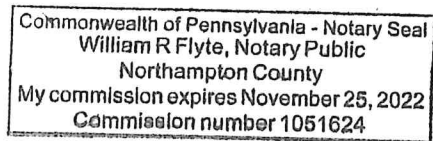
11. Toward the end of Christine's life, she couldn't even go to the bathroom on her own.



PAUL GARIPOLI

Sworn to before me this

4th day of April, 2022


Notary Public

Estate of Fernando Augusto Gonzalez

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF BIRLA
GONZALEZ**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF WESTCHESTER)

BIRLA GONZALEZ, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 27 Keogh Lane, New Rochelle, NY 10805.
2. I am currently 50 years old, having been born on June 25, 1971.
3. I am the wife of Fernando Augusto Gonzalez, upon whose death my claim is based, and submit this upon whom my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. On March 9, 2014, my husband died from thymic cancer at the age of 50. It was medically determined that this illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. On October 27, 2015, I was issued Letters of Administration on behalf of my husband's estate by the Probate Division of the Circuit Court of Pasco County, Florida.
6. Fernando and I had a beautiful family. We lived with our two kids, and he was a wonderful father to our children. He took care of us all.

7. My husband worked for the Department of Corrections. They sent him to the World Trade Center site for a six-month detail to clean the debris and perform recovery operations. He would search through the rubble for survivors and victims, and then he would transport the rubble to the ships that took it to the dump. I don't think anyone knew it would take six months to clean up, or that so many people would get sick from being there. Each day he was breathing in all that dust.

8. I started to notice that things were changing with my husband. He was very good at hiding things, so I always paid close attention to how he was doing. I noticed that his hair was starting to fall out. He was approaching 50 years old, not so old that his hair would start falling out for no reason. He was still a young man. So, he shaved his head. His hands became fragile, he didn't have as much dexterity as he used to. His eyesight also started to decline. Simple things took longer for him, even walking. His step became heavier, like his feet were dragging. It took a lot of energy for him to do anything.

9. I was there with him at the doctor when he received the diagnosis of thymic cancer. It was a terminal prognosis—they gave him six months to live. I was devastated and heartbroken. When Fernando was diagnosed with cancer, he tried to hide it. We hid the diagnosis from our children at first. Fernando was strong, stoic, and never wanted to let anything upset him. He was a corrections officer, so he had a tough attitude. But once he was diagnosed with cancer, he became more sentimental. Everything meant more to him after his diagnosis. He knew that he wasn't going to last. He wanted to move to Florida, because it was always his wish to move there when he retired. So, we packed up our family and moved to Florida.

10. I was working as an esthetician before we moved to Florida, but I quit my job to become my husband's full-time caretaker. I didn't want him to be in a nursing home, and I didn't want anyone else taking care of him. I went with him to every chemotherapy appointment, every doctor's visit and hospital stay. I would coordinate his medicines and feed him at home. I would help him with even simple tasks such as getting around the house. He was extremely drained from all the chemotherapy and medications. My children eventually learned of their father's cancer diagnosis. My daughter had to start driving him around, and she had barely just learned how to drive. Small things frustrated him, because he didn't have as much

control of his body as he used to. Everything took twice the amount of energy it used to. He was irritated that he couldn't walk around, or even walk down the stairs. He was in a lot of pain. It was hard to watch my husband suffer. Witnessing his pain caused me to be depressed. He had a hard struggle with cancer.

11. I miss having a whole family. My life has never been the same since my husband passed away. We received some financial help after Fernando's death, but our lives have changed drastically. But no matter what, I'll never get over this loss. I do everything for my family—for my kids, my loved ones. Fernando did the same. He was a wonderful husband and father.


BIRLA GONZALEZ

Sworn to before me this
14th day of April, 2022


Notary Public

OUSMANE DIOP
Notary Public State of New York
No. 01DI6392371
Qualified in Westchester County
My Commission Expires May 23, 2023

Estate of John James Halpin

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
JOHN C. HALPIN**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF BRONX)

JOHN C. HALPIN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3671 Hudson Manor Terrace, Bronx, NY 10463.

2. I am currently 39 years old, having been born on January 15, 1983.

3. I am the son of John James Halpin, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my father's estate.

4. On May 29, 2014, my father died from bronchial asthma. It was medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On April 21, 2016, I was issued Letters of Administration on behalf of my father's estate from the Surrogate's Court of New York, Orange County.

6. My father and I did everything together. He was my best friend. We spoke on the phone multiple times a day. There was a certain security in having him there. We were very, very close. He was a very healthy, active, vibrant person. He loved to laugh. He could command a room. Looking back, I took his health for granted. I miss the times before his illness. There

was a stark difference before and after he got sick.

7. He responded to the World Trade Center site on September 11, 2001. He got there with the FDNY after the second tower collapsed. At that point, they were hopeful to find survivors. As time went on, they started realizing that it was going to be more of a recovery. There weren't going to be as many survivors as they hoped. He had so many friends and coworkers there. He dug through the rubble, searching voids below the collapse. He was there all the time for months. He went from Ground Zero, back to the firehouse, to Ground Zero again. He was committed to working at the site—he was searching for friends. He would read a roster of the people lost on 9/11 and cry. Some days, he and his coworkers would cry on the pile, because it was too unbearable.

8. We could see him wheezing. He began to have asthma soon after 9/11. I noticed his respiratory distress and watched his breathing get worse. Watching him deteriorate and quietly suffer was the hardest. You would see he was physically struggling, but he would never say anything. Over time, he became more and more quiet because he couldn't breathe. It was hard for him to even laugh, because laughing would cause him to cough. It was very difficult to watch, because it's the most helpless feeling in the world. I saw him struggle to climb stairs, struggle to speak, even struggle to talk on the phone. He would get short of breath while we talked on the phone, and he'd put the phone to his chest so I couldn't hear him wheeze. My father was a stoic person, and very brave. He would never complain.

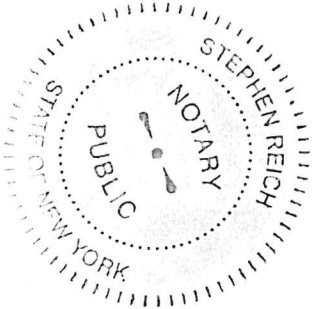
9. He was diagnosed with throat cancer in 2013, and his throat always hurt a lot. The throat cancer took his voice from him; he had little to no ability to speak. He had trouble talking and swallowing. After the throat radiation, he had problems even getting tea or soup down his throat. He coughed a lot. He was prescribed a nebulizer to use every day, and he had an Advair inhaler. He took Advair first thing in the morning and couldn't breathe without it. He had choking coughing fits at night that sounded like an animal. Just gasping, trying to get air, I'll never forget that. He had a feeling of helplessness. He became more distant. He couldn't be as active and involved as he used to be or wanted to be. He was much more withdrawn. He loved his friends and family, but he stopped going out because he was nervous, he'd become too short of breath.

10. He didn't want our family to worry. My mother saw how much his condition was declining, and she knew that he was going to die. He didn't want the doctors to tell my mother and me "too much." He didn't want anyone to have to "go through anything"—he didn't want anyone to suffer. But he suffered greatly. Since his passing, he has missed so many milestones. Promotions, births, weddings, holidays, and graduations. 9/11 changed our lives. We know many other FDNY firefighters who are sick now. Despite his illness, he would have done everything again. He would have gone into the fire again.


JOHN C. HALPIN

Sworn to before me this
4th day of April, 2022


Notary Public



Estate of James J. Marshall

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
ADRIENNE MARSHALL**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

ADRIENNE MARSHALL, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 24 Strawberry Lane, Staten Island, NY 10312.

2. I am currently 67 years old, having been born on May 26, 1954.

3. I am the wife of James J. Marshall, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from lung cancer on November 30, 2014, at the age of 62. The cancer had metastasized to his liver and brain. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On April 2, 2015, I was issued Letters Testamentary with Limitations on behalf of my husband's estate by the Richmond County Surrogate's Court.

6. James and I had a solid relationship. We always got along great. He was an FDNY firefighter, and we loved our friends in the fire department. We loved to travel together, and often went to Florida, Las Vegas and Myrtle Beach. We also loved Atlantic City. James

loved barbecuing and entertaining. There were always friends and neighbors at our house. James also had a side business and was constantly working. It was a good life. I greatly miss it.

7. My husband and my son Jimmy were FDNY firefighters and were 9/11 first responders. They responded right away to the World Trade Center site on 9/11 and continued to work at Ground Zero for another three months after that. Every day, my husband would go to the firehouse, get his assignment, and work for hours straight at the site. He would be gone for two days at a time or more. It went on like that for three to four months straight. James was looking for his friends in the rubble...we lost a lot of friends that day. He was searching through the debris for bodies. It took its toll on him, and he wasn't emotionally well after that.

8. In 2012, we went to a World Trade Center Health Program physical for James, where the doctor told us that he saw "a shadow between his lungs." At the time, it didn't seem like anything was wrong with him. They thought it was scar tissue. We then went to the Brooklyn MetroTech hospital, and the doctor there told us it was inoperable small-cell lung carcinoma. They told us there was nothing they could do and gave him a prognosis of two years to live. We were both shocked and devastated.

9. James never complained, that was one thing about him. But I saw week by week that he was deteriorating. He had less and less energy, which was very out of character for him. I remember one time he wanted to go to Home Depot and buy some sensor lights for one of my sons, who had just bought a new home. We went to Home Depot, and he was moving very slowly. I noticed that he had trouble just walking down the aisle in the store. He started losing his appetite and dropping weight. But he refused to admit to himself that he was sick. He went about doing what he had to do. It was hard for him to even do simple tasks like driving, but he didn't want to depend on anyone else.

10. James underwent chemotherapy and radiation treatments for about a year. These treatments caused him extreme fatigue and really knocked him out. He would go back for PET scans, but the tumor wasn't shrinking. His cancer was metastasizing. It was spreading throughout his lungs, to his kidney, and even to his brain. I remember his attitude started to change. He began to suffer from dementia due to the cancer spreading to his brain. He started imagining things that weren't there, like hearing barking dogs in our backyard that weren't there. I remember my son Jimmy called me one day and said, "You have to come home. Dad is

chopping up the kitchen floor.” I came home and he was literally chopping up my ceramic kitchen floors with construction tools. I knew then that he needed to be taken care of 24/7 and that I couldn’t continue to work. I was devastated. I didn’t want to leave him alone; I couldn’t function anymore. I saw how cancer destroyed his body. James was a big, husky guy and the cancer dwindled him down to nothing. I’ll never forget the way that he looked. It haunts me to this day.

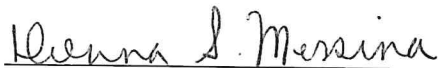
11. I was in charge of James’s day-to-day care. At first, I was working full-time as a pharmacist, so it was hard to take care of him. We got him a male nurse, who came once a week to check in on him. He was in so much pain but would refuse to take any medications. He only took Ibuprofen, and that was just a week before he died. We had a hospice nurse sent in after a while from NYU Langone. He had only two visits with the hospice nurse before passing away.

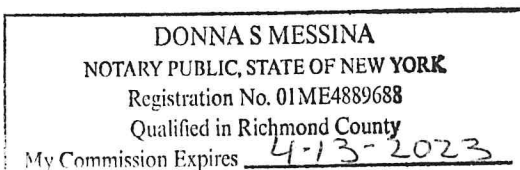
12. James was a great man. He would give you the shirt off his back if you needed it. I was devastated by his death. We had our future planned, we were going to sell the house and move down south for the winter. All our dreams are gone now. He was my partner and my best friend. We could’ve gone on so many more vacations and had many more wonderful times. Now, when I go on vacation, there’s no one to go with. I hate retirement without my husband. I always feel so alone. My three sons have suffered greatly, too. If there is any type of monetary recovery through this lawsuit, the money will be put towards my grandkids’ college funds. I know James would want that.

13. Since the passing of my husband James, I am totally distraught. Most days are a struggle just to get through. I will never move or leave this house. Our street is going to be renamed after James Marshall in his honor. That will be both a proud and difficult day for me.


ADRIENNE MARSHALL

Sworn to before me this
15th day of April, 2022


Notary Public



Estate of James Bronson Munro

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
JOAN ELIZABETH MUNRO**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

JOAN ELIZABETH MUNRO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 55 Normandy Drive, Holbrook, NY 11741.

2. I was born on June 24, 1946.

3. I am the wife of James Bronson Munro, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. On June 29, 2012, my husband died from chronic obstructive pulmonary disease. The World Trade Center Health Program determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On October 14, 2015, I was granted Letters of Limited Administration of my husband's estate by the Surrogate's Court of the County of Suffolk.

6. James and I were married for 40-something years. We always had an active life. He worked until 2006. We camped, we did a lot of traveling, and he was a great builder. James was an auto mechanic for the FDNY. We enjoyed our life: our friends, family, children, and grandchildren.

7. James worked for the FDNY for 25 years. He had about 20 years of service by 2001. On September 11, 2001, James was on duty, working at the FDNY Repair and Transportation Unit in Long Island City. He was a mechanic and supervisor of mechanics. James witnessed the second plane hit the World Trade Center as he was standing on the roof of the building. They started bringing in damaged and destroyed vehicles covered in debris right away. He went down to the World Trade Center site a few times. These trucks were so contaminated with dust and debris. They even found body parts on one of the fire apparatuses.


8. Within a few months after 9/11, James started having difficulty breathing. I recognized his shortness of breath right away, as I happen to be an EMT. Even going up a flight of stairs would give him shortness of breath. He was getting worse and worse, so we had to put him on oxygen therapy and medications. He started on oxygen in 2003. Years later, he had a heart attack. At one point the doctors suggested giving him a lung transplant, but his heart was too weak to safely perform the surgery.

9. The respiratory issues were his biggest problem, they made everything else worse. Aside from his heart attack, he needed the oxygen 24/7 to keep his heart working regularly. His skin was paper thin and he would bruise so easily. I remember watching him bleed from just a little bump.


10. I wanted to emphasize my husband's depression during the course of his illness. If the respiratory disease disabled him partially, the depression disabled him in every other way. He did go to a psychologist for a while, sometimes it helped for him to talk to someone but oftentimes it didn't. His depression magnified as his illness progressed. He was depressed because he couldn't do the day-to-day things he wanted to. Towards the end, even going out to dinner was a big deal. He was sleeping day and night, just sitting in the house. He wasn't himself.

Sworn to before me this
day of April, 2022

Notary Public


JOAN ELIZABETH MUNRO

LISA A. SCOTTO
NOTARY PUBLIC, State of New York
NO. 01SC5021439

Qualified in Suffolk County
Commission Expires: 

Estate of Robert Negri Jr.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
KATHLEEN NEGRI**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

KATHLEEN NEGRI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 18 Redwood Lane, South Setauket, NY 11720.

2. I am currently 61 years old, having been born on September 17, 1960.

3. I am the wife of Robert Negri, Jr. upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. On September 28, 2011, my husband died from stage IV esophageal cancer. His cancer was deemed by the World Trade Center Health Program to be causally connected to his exposure to the toxic air resulting from the September 11th terrorist attacks.

5. On December 31, 2013, I was appointed personal representative of my husband's estate in the Suffolk County Surrogate's Court.

6. Robert and I were married for 27 years. We had a good marriage. We had our three kids, and everything we did was for them. We really never went on vacations much, but we did two vacations with our kids that we adored and treasured. He was a good husband, he was loving, he provided us with a beautiful home. He was always there. We could always count

on him. He was so handy, he did everything himself. He refused to let anyone else work on the house. With him gone, we have to rely on people who we don't know and trust, and they take advantage. He fixed our cars, repaired the pool, and he fixed anything around the house that needed to be done. He was a great husband and a great father.

7. My husband never liked to "bring work home." He was a Nassau County Police Officer, and whatever happened on the force, he always kept to himself. But 9/11 was inescapable. I remember taking my kids to nursery school, and he called me to tell me that he didn't know when he'd be home. In the days following, he would go down to lower Manhattan and transport debris and remains. He also went to the Staten Island Fresh Kills landfill to search through debris. He didn't like to talk about it; it was depressing and devastating.

8. When Robert started having trouble swallowing, I urged him to see a friend of mine who was a gastroenterologist to get checked out. He went to get an endoscopy and they couldn't even proceed because there was a mass in his throat. The doctor took me into a private room and said, "Kath, I think I see a mass in Rob's throat." That was the beginning.

9. He immediately went to get a sonogram and it progressed from there. He was diagnosed with Stage III-IV esophageal cancer. The doctors told us it would be fine, but it wasn't fine. They did more testing, then he went to surgery.

10. Robert was one of the strongest men I ever knew. He never got sick, never missed work. To watch him go from 180 pounds to 140 pounds, frail, and in so much pain, it truly hurt me. Watching him go through chemotherapy and radiation was brutal. The chemotherapy totally wiped him every single time. Most of the time, he wouldn't eat. But after the surgery, he was so hungry and he couldn't eat because they removed part of his stomach. I remember, all he wanted was a steak. But they had to put him on liquids. His pain was terrible. But really, he didn't complain to anybody, especially our kids. I just knew he was in pain because I could see it in his eyes.

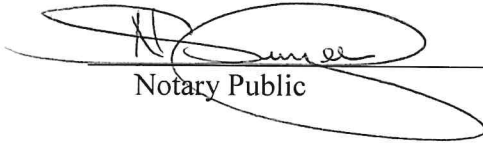
11. Robert always had a short fuse. When he was sick, it got worse. He was very angry. He was angry at his situation; he was angry at the cancer happening to him. He was angry that he wouldn't be there for all our children's milestones. I remember saying to him, "You have to live so you can walk your daughter down the aisle." The fact that he won't walk our daughter Samantha down the aisle at her wedding hurts me every single day. I think about it

every day. Samantha was everything to him. We thought for sure he was going to be there. As time went on, the cancer spread to his bones. When he fell, they had to do back surgery. Again, he was in so much pain he could barely walk or even lay in the hospital bed. I think at one point he succumbed to the fact that the cancer was beating him more than he wanted to beat the cancer.

12. His illness stole all of my husband's opportunities to witness our children's milestones: football games, prom, high school graduations, and college graduations. Him not being there was hard enough. But it hurts even more as a single parent, having to have done all those things alone without my spouse.


KATHLEEN NEGRI

Sworn to before me this
7th day of April, 2022


Notary Public

NICHOLAS SENGER
Notary Public - State of New York
No. 01SE6307628
Qualified in Suffolk County
My Commission Expires July 07, 2022

Estate of Michael Peter Norfort

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

**AFFIDAVIT OF
DEBORA WHITE-NORFORT**

20-CV-00355 (GBD)(SN)

STATE OF NEW YORK)
 : SS.:
COUNTY OF KINGS)

DEBORA WHITE-NORFORT, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 603 MacDonough Street, Brooklyn, New York 11233.
2. I am currently 57 years old, having been born on March 22, 1965.
3. I am the wife of Michael Peter Norfort, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. On September 22, 2008, my husband passed away from lung cancer at the very young age of 44. It was medically determined that his cancer was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. On May 9, 2011, I was issued Letters Testamentary on behalf of my husband's estate by the Surrogate's Court of the State of New York, Kings County.
6. Michael was 100% involved in my life. He was an awesome father, husband, son, and person in general. We did so many things together, even simple things like gardening in our

backyard. We would get up every Sunday and go to church together. We loved fishing, cooking, and going to social outings together. We spent a lot of time at home taking care of our kids. Michael had a passion for construction and building new things. He was our sole provider. He took care of us very well, and he was also a caretaker for his mother.

7. On September 11, 2001, Michael was at work. He was a carpenter, and was employed by the Carpenters Union. Although it wasn't mandated that the union members go to Ground Zero, Michael volunteered to go because that's the kind of person he was. He worked directly on the pile of debris at the World Trade Center. He would tell us about how he was digging bodies out of the rubble, and that sometimes they were finding body parts, not even a whole body. It was so disturbing that we asked him not to tell us anymore about it because it was too difficult to listen to. Michael performed this horrible task every single day for at least a week.

8. In 2007, we were gutting and renovating a home we had recently purchased. During that time, Michael had picked up a hacking cough. After about a month of this non-stop cough, I told Michael that he needed to go to the hospital to get it checked out, but he kept on putting it off. A couple of months later, while I was at work one night, I called home to check on things. My 7-year old son answered the phone and said, "Mom, we haven't eaten dinner yet." I knew I had cooked dinner and that Michael was supposed to make sure the kids were fed. I asked him where his dad was and he said that he was in bed. That was the first red flag. I immediately called Michael. He told me he didn't feel well and had terrible back pain. I left work, went home, and took him to the hospital.

9. On Thanksgiving weekend in 2007, Michael was diagnosed with lung cancer. Before the diagnosis, he had always been a very healthy person, so it was extremely shocking to me. Things went downhill rather quickly. Michael kept the pain to himself most of the time. He had regurgitation, dizziness, and a lot of headaches. He lost his hair, had constant diarrhea, and was always fatigued. It was hard to see the same person suffer so much. He started chemotherapy in January 2008 at Mount Sinai Beth Israel Hospital in Manhattan. He had treatment once every three weeks until July or August of 2008. After that, he was constantly in and out of the hospital. He was only home from the hospital for a short time when he passed

away on September 22, 2008.

10. As his illness progressed, Michael became very depressed. There were days that he would just sit and cry, but he would never do it when the kids were around. He was only 44 years old, and it was devastating to him to know that he wouldn't be there to take care of me and the children or his parents. It worried him. He also knew that he would miss out on so many milestones. When his friends came by to check in on him, he would not be talkative at all. He was withdrawn, and many days it just seemed that the sadness overwhelmed him.

11. Michael was a hard worker. He was a caretaker to his mother and father. He raised my two older children, Tiffany and Gary, who were not his biological children. He raised them as if they were his own. He was a wonderful father to all 4 of our children. He was always helping people—friends, family members, and neighbors. When Michael was diagnosed with cancer, it touched a lot of souls. When he passed, we had two rooms in the funeral home, but so many people came to pay their respects that we needed three rooms. That's the impact that he had on so many lives. I miss him terribly. It's been difficult for me to watch my children navigate life without their father. They go to their sports games and see everyone else with their dads there. And even though mom is always sitting in the stands, I know it's not the same. I feel that for them.

12. Michael always hoped that one day he'd have his children work in the construction trade with him. After Michael was diagnosed with cancer, he got Gary a job in construction. He was so excited for Gary that he went with him to his first day on the job. Michael was down to weighing only 101 lbs. on that day. The boss said, "Gary, if you bring your sick father back to this construction site, I'll have to fire you tomorrow."

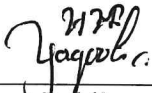
13. Michael made a good life for himself and his family. I can say that he's truly missed by everyone who had the privilege to know him. His passing put a big strain on our family emotionally and financially. Today, I am fighting a foreclosure on my home. I wouldn't be going through what I'm going through if Michael were still here. He was a good husband. When I first met him thirty years ago, Michael was in Phoenix House (a drug and alcohol rehabilitation program). We went out to dinner for his birthday, and I paid. Later that night, he said, "When I get out and go back to work, seventy-five cents of every dollar is yours." He kept

that promise to me. He was truly a man of his word. He was a good husband, and he is sorely missed.



DEBORA WHITE-NORFORT

Sworn to before me this
05th day of April, 2022



Notary Public

HAFIZ M. YAQOOB

Notary Public - State of New York

No. 01YA6174031

Qualified in Queens County

My Commission Expires September 10, 2023

Estate of Stephen E. Phillips

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
DEBRA L. PHILLIPS**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF SOUTH CAROLINA)

: SS.:

COUNTY OF LANCASTER)

DEBRA L. PHILLIPS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3072 Streamhaven Drive, Indian Land, SC 29707.
2. I am currently 64 years old, having been born on December 21, 1957.
3. I am the wife of Stephen E. Phillips, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. On August 2, 2015, my husband Stephen died from metastatic colon cancer at age 58. Stephen's cancer was found to be caused by his exposure to toxins resulting from the 9/11 attacks on the World Trade Center.
5. On July 3, 2017, I was appointed personal representative of my husband's estate in the Lancaster, South Carolina Probate Court.
6. Stephen was a good, hard-working man. He worked in a very male environment at the Fulton Fish Market. He was like our "Superman," our protector. He was a very likeable guy and was sociable. He loved to cook, loved gardening, and loved hosting events with our friends and neighbors. We had a very good life together. Stephen was one of eight children and

had a very strong family relationship. I came from a strained family background, and Stephen was always very understanding and protective of me.

7. The World Trade Center attacks took a heavy toll on Stephen. On 9/11, I couldn't reach him over the phone at first. When I called him, he told me he was getting hit with debris. He was panicking; he watched people on fire jumping out of the windows of the World Trade Center. I kept encouraging him to get home safely, but he stayed behind and filled up his car with strangers to drive them across the bridge into Brooklyn from lower Manhattan. Stephen was devastated by what he saw that day. In the days and weeks after 9/11, he sat in front of the TV all day until after dark. He had severe weight loss and suffered from Post-Traumatic Stress Disorder. In the years after the attacks, he kept telling me how people he worked with were getting "sick with weird cancers."

8. When we learned about Stephen's Stage III colon cancer diagnosis, we were shocked. We didn't know at first that the illness was linked to his exposure on and after 9/11. We were very confused at first because Stephen did not have a family history of colon cancer.

9. Stephen's colon cancer treatments gave him severe anxiety. It was so bad that I had to give him Xanax before his treatments. Stephen was also on several medications for depression. They even thought he was having a heart attack during one of his treatments. Later, he had a blood clot in his leg. I had to give him at-home injections for the blood clot in his leg, because our insurance wouldn't cover it. He also had a terrible fluid ablation. He was on oxygen, had to use catheters, a nebulizer, and other medical devices at home.

10. When he got sick, Stephen became so depressed that he would cry. I watched out for his family. He worried constantly about how he would take care of his family when he was sick. He became withdrawn and did not want to be seen out in public with his oxygen tank or wearing a diaper.

11. It was also difficult financially for us. Stephen had to stop working because of his colon cancer. I had to continue working so we could afford medication for Stephen that was not covered by insurance, but he was upset to see me working. I would come home for lunch breaks to see Stephen when his illness kept him at home. He would tell me he couldn't imagine not being there for me and our family. We always wanted to move to South Carolina, but we had to move earlier than we had planned because it was not financially feasible for us to stay in New

York. We moved to South Carolina after Stephen was diagnosed, right around the time that our son Craig's wife was pregnant with our grandchild. We left everyone that we loved behind in New York, but moving to South Carolina was the only way we could afford to live.

12. Stephen fought extremely hard during his illness. He didn't deserve this. Stephen's death has changed the course of all of our lives.


DEBRA L. PHILLIPS

Sworn to before me this
7 day of April, 2022


Notary Public



Estate of Mary Elizabeth Reynolds

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

AFFIDAVIT OF
SHANNON REYNOLDS

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
 : SS.:
COUNTY OF MONMOUTH)

SHANNON REYNOLDS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 39 Circle Place, Lincroft, New Jersey 07738.

2. I am currently 29 years old, having been born on October 2, 1992.

3. I am the daughter of Mary Elizabeth Reynolds, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my mother's estate.

4. My mother passed away from peritoneal carcinoma on October 22, 2014, at the age of 51. It was determined by the World Trade Center Health Program that this illness was causally connected to her exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. On December 22, 2014, I was issued Letters of Administration for my mother's estate by the Richmond County New York Surrogate's Court.

6. I was only 22 years old when my mom passed. She was a single mom, and she was everything to me. We would get up early so she could drop me off at school before sending me on the bus to go to the city. She took time off work when I was sick to take care of me.

Some days, she would take me to work with her. She took me to all my after-school activities. I took dance classes since I was 3 years old, and she would watch every single class of mine until high school. In third grade, I started cheerleading, and she would bring me to every practice. She'd just wait in the car for me, no matter how long the practice was. In between all of that, she made sure that I spent time with my cousins. We went ice skating, out to eat, anything to make sure that we could spend time together.

7. On the morning of September 11, 2001, my mom was on her way into work. She was on a bus, about to enter the Brooklyn Battery Tunnel when the first plane hit the World Trade Center. We didn't have cellphones, but she panicked when she heard what had happened. She was finally able to get in touch with my aunt, who sent my Uncle Scott to pick me up from school. It was hours before my mom could get back home. Soon after, she started going into the city to work at the World Financial Center. She couldn't even take public transportation there. She was doing work for Merrill Lynch at the time, and they had provided a special shuttle that went straight to the World Financial Center. The fires were still burning at Ground Zero when my mom returned to work. She recovered hardware with her team for months. My mom always came home filthy, covered in dust from the debris. I mostly stayed with my grandma during that time.

8. In September 2013, I learned of my mom's cancer diagnosis. She was probably suffering for a long time before she was seen by a doctor—she was always hiding her pain. She had fallen in the shower because her stomach pain was so severe. She drove herself to the hospital and had to be taken into the hospital by a security guard in a wheelchair because she couldn't even park her car – that's how much pain she was in. They gave her all kinds of tests and scans. The doctors said she had a mass on her ovaries, and an oncologist confirmed it was cancer. I left to go get her prescriptions, and when I came back, she just stayed in her room for the rest of the day. Her diagnosis was jarring because it came out of nowhere. She didn't have any history of cancer before that. Her cancer was in a late stage and was advancing quickly.

9. She had a hysterectomy soon after her diagnosis. They cut her whole stomach open. She had so many staples in her body and so many scars. She was in excruciating pain once all the medications wore off after her surgery. I knew she had to be really miserable, because my mom had a high pain tolerance. She was crying out for help. She would call me in

the middle of the night to say that she was in so much pain and the doctors couldn't give her more medications. Out of sheer desperation, I'd leave my house and drive to the hospital to talk to the nurses on staff, just to see if there was anything they could do. She went through chemotherapy, and it made her so sick. She lost all her hair. She was always nauseous, she couldn't eat or drink. She was forced to drink protein shakes. I remember sitting through the PET scans with her where she couldn't move, and she would come out crying because she was so uncomfortable.

10. After the first round of chemotherapy, the doctors said she was okay. Her surgery margins were good. Even though they found colon cancer in her, they thought they got it. They told her, come back for a six-month scan. So, six months later, she went back to the doctor. And the cancer was everywhere. She couldn't feel it, but they could see it. It came back so fast. They did an additional surgery, which was terribly painful for her because they had to cut open her old scars for the new surgery. The second surgery was a waste, the doctors couldn't even do anything because her cancer had spread so much. They discharged her from the hospital and told us she had two weeks to live.

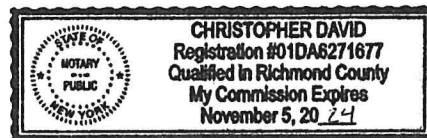
11. My mom was always the funniest person in the room. She always had a smile on her face, and she made the best of any situation. From the time of her diagnosis until her death, it was like the life had been sucked out of her. She was so depressed, so distraught. She was bedridden. She was so scared, and so was I. I didn't want to lose her, but I didn't want her to continue to suffer. It was torturous. I don't know what else to say—there aren't any words. My mom is gone and my life will never be the same. There's nothing that can make up for that.

Shannon Reynolds
SHANNON REYNOLDS

Sworn to before me this

9 day of April, 2022

[Signature]
Notary Public



Estate of William Sheldon

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

AFFIDAVIT OF
GEBRAELA SHELDON

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF FLORIDA)
 : SS.:
COUNTY OF SEMINOLE)

GEBRAELA SHELDON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2408 Willow Drop Way, Oviedo, FL 37266.
2. I am currently 39 years old, having been born on January 30, 1983.
3. I am the wife of William Sheldon, upon whose death my claim is based, and submit this upon whom my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my late husband's estate.
4. My husband passed away from colon cancer on March 2, 2015, at the age of 47. It was determined by the World Trade Center Health Program that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. On April 21, 2015, I was issued a Certificate of Qualification as Executor of my husband's estate by the Circuit Court of Fairfax County, Virginia.
6. My husband was a fully healthy man before he was diagnosed with colon cancer. We lived a normal, active life. We went on vacations together, and did lots of activities with our two children, Anna and John. We had a wonderful relationship. He was a loving, wonderful

husband and a great father. He was an all-around great man.

7. When 9/11 happened, Bill was working downtown by the World Trade Center. He was right there when the first and second tower fell. He saw people falling out of the towers. Bill was an agent for the Bureau of Alcohol, Tobacco, and Firearms. He worked for three weeks at the Staten Island landfill, digging through all the rubble and finding bodies. He was trying to find survivors but there were none. It was very sad for him, finding bodies and body parts. He told me of the times that he found hands, arms, and legs. It was exhausting for him, both mentally and physically. He was working many hours of overtime, sometimes working overnight. He was emotionally drained from what he had seen with his own eyes.

8. He was diagnosed with colon cancer in January 2014. He was feeling tired, and he was not feeling like himself. He went to the World Trade Center Health Program to get checked out once a year. During his visit, he was complaining about pain in his right side. They gave him an x-ray, which revealed that he already had Stage IV colon cancer. By that time, it had spread to his liver.

9. Bill was in extreme pain. He went through chemotherapy and surgery several times. We had to travel at least once a month from Florida to New York City, because his liver doctor was at Sloan Kettering Cancer Center. He would get chemo every two weeks and it made him extremely sick. The cancer was in his stomach, and the chemotherapy would cause him to vomit all the time. He was on pain medications almost all of the time. His quality of life was zero. We went to New York for a surgery to have a pump put into his liver. During the same surgery, they also removed his colon tumor. He had stitches from his chest, all the way down to his stomach. He had thirty staples in his torso. He was in so much pain. It was an awful time.

10. The cancer made Bill extremely depressed. There was not a day that he felt good. He was taking anti-depressants, and so was I. We knew it would be bad when he was diagnosed with Stage IV cancer, but he fought it as hard as he could. Towards the end, his cancer spread everywhere. When he went to the hospital, they had to sedate him completely. That was the only way he could be free of pain.


11. Bill was a true patriot. He joined the army after 9/11, at age 37. He knew that was an opportunity to serve his country. Now, my son sees his legacy and wants to join the army and serve his country, too. My kids will never have a father, and I will never have a husband. He

couldn't see his kids because he was either sick in the hospital all the time, or lying in bed at home. My daughter doesn't even remember her father, because he fell sick shortly after her fourth birthday. My children lost their innocence at a very young age. They saw suffering. My husband will never be there to see our kids graduate or get married. Bill will never walk Anna down the aisle. He will never be there to see his grandchildren one day. My son just started to drive, his father should have been there to teach him. I remember seeing my son John cry, and ask, "Why does this have to happen to Papa?" Our life as a family was taken away from us. All that we could have had was taken away from us, and it still hurts.



GEBRAELA SHELDON

Sworn to before me this
8 day of April, 2022


Notary Public